List of Changes Published for July 28-29, 2020 TC-22, BP-22 and EIM Phase III Workshop	
Section	Description of Proposed Change(s)
3.1 Internal Resources – Transmission	Added language
Rights	
3.3.1 Application	Added language
4.1.2.2 Registration	Added language
4.1.6 Dispute Resolution with the MO	Added language
4.2.4.5.1 Preliminary Submission of	Added language
Transmission Customer Base Schedules	
by Transmission Customers with	
Resources Or Load in the BPA BAA	
4.2.4.5.2 Final Submissions of	Added language
Transmission Customer Base Schedules	
6.1 Compliance with Reliability Standards	Added language

ATTACHMENT Q

EIM

1. General Provision - Purpose and Effective Date of Attachment Q

Attachment PQ provides for Transmission Provider's participation as the PGEBPA EIM Entity in the EIM administered by the MO. Attachment P shall be in effect upon its acceptance by the Commission, with the exceptions provided below, for as long as Transmission Provider implements the EIM and until all final settlements are finalized resulting from such implementation. Sections 4.1.5, 4.1.6, 8 and 10 of this Attachment PQ take effect no earlier than October 1, 2017 on the date the EIM goes live in the BPA BAA, or the implementation date of Transmission Provider's participation in the EIM, whichever is later. All other sections of this Attachment PQ take effect no earlier than July 25, 2017 or seven (7) days prior to the start of parallel operations date the EIM goes live in the BPA BAA.

This Attachment PQ shall apply to all Transmission Customers and Interconnection Customers, as applicable, with new and existing service agreements under Parts II and III and Attachments MA, F, L and ON of this Tariff. To the extent an Interconnection Customer controls the output of a generator located in PGE'sBPA's BAA, the PGEBPA EIM Entity may require the Interconnection Customer to comply with a requirement in this Attachment PQ that on its face applies to a Transmission Customer to the extent that the PGEBPA EIM Entity makes a determination, in its sole discretion, that the Interconnection Customer is the more appropriate party to satisfy the requirements of Attachment PQ than any Transmission Customer.

This Attachment PQ shall work in concert with the provisions of the MO Tariff implementing the EIM to support operation of the EIM. To the extent that this Attachment PQ is inconsistent with a provision in the remainder of this Tariff with regard to the PGEBPA EIM Entity's administration of the EIM, this Attachment PQ shall prevail.

This Attachment PQ governs the relationship between the PGEBPA EIM Entity and all Transmission Customers and Interconnection Customers subject to this Tariff. This Attachment PQ does not establish privity between Transmission Customers and the MO or make a Transmission Customer subject to the MO Tariff. Any Transmission Customer duties and obligations related to the EIM are those identified in this Tariff, unless the Transmission Customer voluntarily elects to participate directly in the EIM with PGEBPA EIM Participating Resources, in which case the MO Tariff provisions for EIM Participating Resources and EIM Participating Resource Scheduling Coordinators shall also apply.

2. Election of Transmission Customers to become BPA EIM Participating Resources

The decision of a Transmission Customer to participate in the EIM with resources as <u>PGEBPA</u> EIM Participating Resources is voluntary. A Transmission Customer that chooses to have a resource become a <u>PGEBPA</u> EIM Participating Resource must:

- (1) Meet the requirements specified in Section 3 of this Attachment <u>PQ</u> and the <u>PGEBPA</u> EIM BP÷;
- (2) Become or retain a MO-certified EIM Participating Resource Scheduling Coordinator; and
- (3)- Follow the application and certification process specified in this Attachment <u>PQ</u> and the <u>PGEBPA</u> EIM BP posted on the Transmission Provider's OASIS.

Transmission Customers which own-or, control, or market multiple resources may elect to have any or all of their resources be <u>PGEBPA</u> EIM Participating Resources, in which case any resources that <u>are not elected by</u> the Transmission Customer <u>does not elect</u> to be <u>PGEBPA</u> EIM Participating Resources shall be treated as Non-Participating Resources for purposes of this Attachment <u>PO</u>.

- 3. Eligibility to be a BPA EIM Participating Resource
- 3.1 Internal Resources Transmission Rights

Resources owned, or controlled, or marketed by Transmission Customers and located within the metered boundaries of PGE-8PA's BAA are eligible to become PGE-8PA EIM Participating Resources. The Transmission Customer that owns, or markets the resource must have associated transmission rights based on one of the following:

(1) The resource is a designated Network Resource of a Network Customer and the Network Customer elects to participate in the EIM through its Network Integration Transmission Service Agreement; or

(2) The resource is associated with either (i) a Service Agreement for Firm Point-to-Point Transmission Service, or (ii) a Service Agreement for Non-Firm Point-to-Point Transmission Service, and such Transmission Customer elects to participate in the EIM.

3.2 Resources External to BPA's BAA

3.2.1 Use of Pseudo-Ties

A resource owned or controlled by a Transmission Customer that is not physically located inside the metered boundaries of PGE'sBPA's BAA may participate in the EIM as a PGEBPA EIM Participating Resource if the Transmission Customer (1) implements a Pseudo-Tie into PGE'sBPA's BAA, consistent with PGE'sBPA's business practice_posted on Transmission Provider's OASIS, (2) has arranged firm transmission over any third-party transmission systems to a PGEBPA BAA intertie boundary equal to the amount of energy that will be Dynamically Transferred through a PseudoTiePseudo-Tie into PGE'sBPA's BAA, consistent with PGE'sBPA's business practice posted on Transmission Provider's OASIS, and (3) has secured transmission service consistent with Section 3.1 of this Attachment PQ.

3.2.2 Pseudo-Tie Costs

Pseudo-Tie implementation costs shall be allocated in a manner consistent with the treatment of Network Upgrades and Direct Assignment Facilities to facilitate a Pseudo-Tie into <u>PGE'sBPA's</u> BAA.

3.3 Application and Certification of BPA EIM Participating Resources

3.3.1 Application

To register a resource to become a PGE-BPA EIM Participating Resource, an applicanta Transmission Customer must submit a completed application, as set forth in the PGE-BPA EIM BP, and shall provide a deposit of \$1,500an application fee as specified in the BPA EIM BP for the PGE-BPA EIM Entity to process the application. Upon completion of processing the completed application, the PGE EIM Entity shall charge and the applicant shall pay the actual costs of the application processing. Any difference between the deposit and the actual costs of the application processing shall be paid by or refunded to the PGE EIM Participating Resource applicant, as appropriate. At the time of application, any PGEBPA EIM Participating Resource applicant must elect to perform the duties of either a CAISO Metered Entity or Scheduling Coordinator Metered Entity, consistent with the MO's requirements and additional technical requirements set forth in the PGEBPA EIM BP, as applicable.

3.3.2 Processing the Application

The <u>PGEBPA</u> EIM Entity shall make a determination as to whether to accept or reject the application within 45 days of receipt of the application. At minimum, the <u>PGEBPA</u> EIM Entity

shall validate through the application that the PGE EIM Participating Resource applicant Transmission Customer has satisfied Sections 3.1 and 3.2 of this Attachment PO, as applicable, and met minimum telemetry and metering requirements, as set forth in the MO's requirements and the PGEBPA EIM BP. Within 45 days of receipt of the application and in accordance with the process outlined in the PGEBPA EIM BP, the PGEBPA EIM Entity may request additional information and will attempt to resolve any minor deficiencies in the application with the Transmission Customer. The PGEBPA EIM Entity may extend the 45-day period to accommodate the resolution of minor deficiencies in the application in order to make a determination on an application. If the PGEBPA EIM Entity approves the application, it shall send notification of approval to both the PGE EIM Participating Resource applicant Transmission Customer and the MO. The process by which the PGEBPA EIM Entity sends notification of approval shall be set forth in the PGEBPA EIM BP. If the PGEBPA EIM Entity rejects the application, the PGEBPA EIM Entity shall send notification stating the grounds for rejection to the PGE EIM Participating Resource applicant. Transmission Customer. Upon request, the PGEBPA EIM Entity may provide guidance to the applicant as to how the PGE EIM Participating Resource applicant Transmission Customer may cure the grounds for the rejection. In If the event that the PGEBPA EIM Entity has granted an extension of the 45-day period but the applicant Transmission Customer has neither provided the additional requested information nor otherwise resolved identified deficiencies within six (6) months of the PGEBPA EIM Entity's initial receipt of the application, the application shall be deemed rejected by the PGEBPA EIM Entity. If an application is rejected, the PGE EIM Participating Resource applicant Transmission Customer may resubmit its application at any time (including submission of a new processing fee deposit).

3.3.3 Certification Notice

Upon approval of an After the BPA EIM Entity has approved Transmission Customer's application and in accordance with the process specified in, the PGEBPA EIM BP, certification by Entity shall certify the PGE EIM Entity of the PGETransmission Customer's BPA EIM Participating Resource to participate in the EIM shall occur accordance with the BPA EIM BP once the Transmission Customer has demonstrated and the MO has confirmed that the Transmission Customer has:

- (1) Met the MO's criteria to become an EIM Participating Resource and executed the MO's proforma-EIM Participating Resource Agreement;
- (2) Qualified to become an EIM Participating Resource Scheduling Coordinator and have executed the MO's Meter Service Agreement for Scheduling Coordinators, or retained the services of a MO-certified EIM Participating Resource Scheduling Coordinator that has executed the MO's pro forma Meter Service Agreement for Scheduling Coordinators;

- (3) Met the necessary metering requirements of this Tariff and Section 29.10 of the MO Tariff and the EIM Participating Resource Scheduling Coordinator has executed the MO's pro forma Meter Service Agreement for Scheduling Coordinators; and
- (4) Met communication and data requirements of this Tariff and Section 29.6 of the MO Tariff; and has the ability to receive and implement the MO's Dispatch Instructions every five minutes from the MO.

Upon receiving notice from the MO of the completion of the enumerated requirements by the Transmission Customer, the <u>PGEBPA</u> EIM Entity shall provide <u>written</u> notice to both the Transmission Customer with a <u>PGEBPA</u> EIM Participating Resource and the MO that the <u>PGEBPA</u> EIM Participating Resource is certified and therefore eligible to participate in the EIM. The process by which the <u>PGEBPA</u> EIM Entity certifies Transmission Customers with a <u>PGEBPA</u> EIM Participating Resource shall be set forth in the <u>PGEBPA</u> EIM BP.

3.3.4 Status of Resource Pending Certification

If the Transmission Customer (i) has submitted an application for a resource to be a <u>PGEBPA</u> EIM Participating Resource but the application has not been approved, or (ii) has not yet been certified by the <u>PGEBPA</u> EIM Entity consistent with Section 3.3.3 of this Attachment <u>PQ</u>, the resource shall be deemed to be a Non-Participating Resource.

3.3.5 Notice and Obligation to Report a Change in Information

Each Transmission Customer with a <u>PGEBPA</u> EIM Participating Resource has an ongoing obligation to inform the <u>PGEBPA</u> EIM Entity of any changes to any of the information submitted as part of the application process under this Attachment <u>PQ</u>. The <u>PGEBPA</u> EIM BP shall set forth the process and timing requirements for notifying the <u>PGEBPA</u> EIM Entity of such changes.

This information includes, but is not limited to:

- (1) Any change in the <u>PGEBPA</u> EIM Participating Resource Scheduling Coordinator representing the resource;
- (2) Any change in the ownership or control of the resource;
- (3) Any change to the physical characteristics of the resource required to be reported to the MO in accordance with Section 29.4(c)(4)(C) of the MO Tariff; or
- (4) If either the MO terminates the participation of the <u>PGEBPA</u> EIM Participating Resource in the EIM or the Transmission Customer has terminated the <u>PGEBPA</u> EIM Participating Resource's participation in the EIM; in either case, that resource shall be considered to be a Non-Participating Resource for purposes of this Tariff, including Attachment <u>PQ</u>.

- 4. Roles and Responsibilities
- 4.1 Transmission Provider as the BPA EIM Entity and the BPA EIM Entity Scheduling Coordinator

4.1.1 Responsibilities

4.1.1.1 Identification of EIM Entity Scheduling Coordinator

The <u>PGEBPA</u> EIM Entity can serve as the <u>PGEBPA</u> EIM Entity Scheduling Coordinator or retain a third party to perform such role. If the <u>PGEBPA</u> EIM Entity is not the <u>PGEBPA</u> EIM Entity Scheduling Coordinator, the <u>PGEBPA</u> EIM Entity shall communicate to the <u>PGEBPA</u> EIM Entity Scheduling Coordinator the information required by the <u>PGEBPA</u> EIM Entity Scheduling Coordinator to fulfill its responsibilities in the EIM.

The <u>PGEBPA</u> EIM Entity Scheduling Coordinator shall coordinate and facilitate the EIM in accordance with the requirements of the MO Tariff. The <u>PGEBPA</u> EIM Entity Scheduling Coordinator must meet the certification requirements of the MO and enter into any necessary MO agreements.

4.1.1.2 Processing BPA EIM Participating Resource Applications

The <u>PGEBPA</u> EIM Entity shall be responsible for processing applications of Transmission Customers seeking authorization to participate in the EIM with resources as <u>PGEBPA</u> EIM Participating Resources in accordance with Section 3.3 of this Attachment <u>PO</u>.

4.1.1.3 Determination of EIM Implementation Decisions for BPA's BAA

The <u>PGEBPA</u> EIM Entity is solely responsible for making any decisions with respect to EIM participation that the MO requires of EIM Entities. The <u>PGEBPA</u> EIM Entity has made the following determinations:

- (1) Eligibility requirements: Eligibility requirements for BPA EIM Participating Resources are set forth in Section 3 of Attachment PQ.
- (2) Load Aggregation Points: (LAP): There shall be one LAP for PGE's BPA's BAA.

(3) **Under review.**

_(4) MO metering agreements: The <u>PGEBPA</u> EIM Entity and all Transmission Customers with <u>PGEBPA</u> EIM Participating Resources shall have the option to elect to be Scheduling Coordinator Metered Entities or CAISO Metered Entities in accordance with Section 29.10 of the MO Tariff. The <u>PGEBPA</u> EIM Entity shall be a Scheduling Coordinator Metered Entity on behalf of all Transmission Customers with Non-Participating Resources in accordance with Section 29.10 of the MO Tariff.

4.1.1.4 BPA EIM Business Practice

The <u>PGEBPA</u> EIM Entity shall establish and revise, as necessary, procedures to facilitate implementation and operation of the EIM through the <u>PGEBPA</u> EIM BP that shall be posted on the Transmission Provider's OASIS.

4.1.1.5 Determination to Take Corrective Actions or Permanently Terminate Participation in the EIM

The <u>PGEBPA</u> EIM Entity may take corrective actions in <u>PGE'sBPA's</u> BAA in accordance with the requirements of Section 10.3 of Attachment <u>PQ</u>.

In addition, the <u>PGEBPA</u> EIM Entity, in its sole and absolute discretion, may permanently terminate its participation in the EIM by providing notice of termination to the MO pursuant to applicable agreements and by making a filing pursuant to Section 205 of the Federal Power Act to revise this Tariff consistent with the Commission's requirements.

4.1.2 Responsibilities of the BPA EIM Entity to Provide Required Information

4.1.2.1 Provide Modeling Data to the MO

The <u>PGEBPA</u> EIM Entity shall provide the MO information associated with transmission facilities within <u>PGE'sBPA's</u> BAA, including, but not limited to, network constraints and associated limits that must be observed in <u>PGE'sBPA's</u> BAA network and interties with other BAAs.

4.1.2.2 Registration

The PGE BPA EIM Entity shall register all Non-Participating Resources with the MO. The PGE BPA EIM Entity may choose to obtain default energy bids from the MO for Non-Participating Resources that are Balancing Authority Area Resources. The PGE BPA EIM Entity shall update this information in accordance with the MO's requirements as revised information is received from Transmission Customers with Non-Participating Resources in accordance with Section 4.2.1.2 of this Attachment PQ.

4.1.3 Day-to-Day EIM Operations

4.1.3.1 Submission of Transmission Customer Base Schedule, Forecast Data for Non-Participating Resources that are Variable Energy Resources, and Resource Plans

The <u>PGEBPA</u> EIM Entity is responsible for providing the data required by the MO in accordance with Section 29.34 of the MO Tariff, including but not limited to: (1) hourly Transmission Customer Base Schedules; (2) Forecast Data for Non-Participating Resources that are Variable Energy Resources; and (3) Resource Plans.

4.1.3.2 Communication of Manual Dispatch Information

The <u>PGEBPA</u> EIM Entity shall inform the MO of a Manual Dispatch by providing adjustment information for the affected resources in accordance with Section 29.34 of the MO Tariff.

4.1.3.3 Confirmation

The MO shall calculate, and the <u>PGEBPA</u> EIM Entity shall confirm, actual values for Dynamic Schedules reflecting EIM Transfers to the MO within 60 minutes after completion of the Operating Hour to ensure the e-Tag author will be able to update these values in accordance with WECC <u>business practices</u> through an update to the e-Tag.

4.1.3.4 Dispatch of EIM Available Balancing Capacity of a Non-Participating Resource

Upon notification by the MO, the <u>PGEBPA</u> EIM Entity shall notify the Non-Participating Resource of the Dispatch Operating Point for any EIM Available Balancing Capacity from the <u>NonParticipating Non-Participating</u> Resource, except in circumstances in which the <u>PGEBPA</u> EIM Entity determines the additional capacity is not needed for the BAA or has taken other actions to meet the capacity need.

4.1.4 Provision of Meter Data

The <u>PGEBPA</u> EIM Entity shall submit load, resource, and Interchange meter data to the MO in accordance with the format and timeframes required in the MO Tariff on behalf of Transmission Customers with Non-Participating Resources, loads, and Interchange.

4.1.5 Settlement of MO Charges and Payments

Under review.

4.1.6 Dispute Resolution with the MO

The <u>PGE_BPA</u> EIM Entity shall manage dispute resolution with the MO for the <u>PGE_BPA</u> EIM Entity settlement statements consistent with Section 29.13 of the MO Tariff, Section 12 of this Tariff, and the <u>PGE_BPA</u> EIM BP. Transmission Customers with <u>PGE_BPA</u> EIM Participating Resources shall manage dispute resolution with the MO for any settlement statements they receive directly from the MO.

4.2 Transmission Customer Responsibilities

The following must comply with the information requirements of this section: (1) Transmission Customers with a PGEBPA EIM Participating Resource; (2) Transmission Customers with a NonParticipating Resource; (3) Transmission Customers with load within PGE'sBPA's BAA; and (4) subject to the limitations identified in Section 4.2.4.5.1 of this Attachment PQ, Transmission Customers wheeling through PGE'sBPA's BAA.

4.2.1 Initial Registration Data

4.2.1.1 Transmission Customers with a BPA EIM Participating Resource

A Transmission Customer with a <u>PGEBPA</u> EIM Participating Resource shall provide the MO and the <u>PGEBPA</u> EIM Entity with data necessary to meet the requirements established by the MO to register all resources with the MO as required by Section 29.4(e)(4)(D) of the MO Tariff.

4.2.1.2 Transmission Customers with Non-Participating Resources

A Transmission Customer with Non-Participating Resources shall provide the <u>PGEBPA</u> EIM Entity with data necessary to meet the requirements established by the MO as required by Section 29.4(c)(4)(C) of the MO Tariff.

4.2.2 Responsibility to Update Required Data

4.2.2.1 Transmission Customers with a BPA EIM Participating Resource

Each Transmission Customer with a <u>PGEBPA</u> EIM Participating Resource has an ongoing obligation to inform the MO and <u>PGEBPA</u> EIM Entity of any changes to any of the information submitted by the Transmission Customer provided under Section 4.2.1 of this Attachment <u>PQ</u> that reflects changes in operating characteristics as required by Section 29.4(e)(4)(D) of the MO Tariff. The <u>PGEBPA</u> EIM BP shall set forth the process and timing requirements of notifying the <u>PGEBPA</u> EIM Entity of such changes.

4.2.2.2 Transmission Customers with Non-Participating Resources

Each Transmission Customer with a Non-Participating Resource has an ongoing obligation to inform the PGEBPA EIM Entity of any changes to any of the information submitted by the Transmission Customer with a Non-Participating Resource provided under Section 4.2.1 of this Attachment PQ. The PGEBPA EIM BP shall set forth the process and timing requirements of notifying the PGEBPA EIM Entity of such changes.

4.2.3 Outages

Under review.

4.2.4 Submission of Transmission Customer Base Schedule

A Transmission Customer shall submit the Transmission Customer Base Schedule to the PGE BPA EIM Entity. This submission must include Forecast Data on all resources, Interchange, and Intrachange which balance to the Transmission Customer's anticipated load, as applicable. If the Transmission Customer does not serve load within PGE's BPA's BAA, submission of the Transmission Customer Base Schedule shall include Forecast Data on all resources, Interchange, and Intrachange which shall balance to the Transmission Customer's anticipated actual

generation within <u>PGE's BPA's BAA</u>. The submissions shall be in the format and within the timing requirements established by the MO and the <u>PGE BPA EIM Entity</u> as required in Section 4.2.4.5 of this Attachment <u>PQ</u> and the <u>PGE BPA EIM BP</u>.

4.2.4.1 Transmission Customers with a BPA EIM Participating Resource or Non-Participating Resource in the BPA BAA

A Transmission Customer with a <u>PGEBPA</u> EIM Participating Resource or a Non-Participating Resource is not required to submit Forecast Data for:

- (1) resources located in PGE'sBPA's BAA that are less than three MW; or
- (2) behind-the-meter generation which is not contained in the MO's network model.

Each <u>PGEBPA</u> EIM Participating Resource Scheduling Coordinator shall provide to the <u>PGEBPA</u> EIM Entity the energy bid range data (without price information) of the respective resources it represents that are participating in the EIM.

Each <u>PGEBPA</u> EIM Participating Resource Scheduling Coordinator shall also provide the <u>PGEBPA</u> EIM Entity with Dispatch Operating Point data of the respective resources it represents that are participating in the EIM.

4.2.4.2 Transmission Customers with Non-Participating Resources that are Variable Energy Resources

Under review.

4.2.4.3 Transmission Customers with Load

As set forth in Sections 4.2.4 of this Attachment PQ, a Transmission Customer is required to submit Forecast Data on all resources, Interchange, and Intrachange which balance to the Transmission Customer's anticipated load, as applicable. For purposes of settling Energy Imbalance Service pursuant to Schedule 4 and Schedule 4R of this Tariff, tThe PGEBPA EIM Entity shall calculate the load component of the Transmission Customer Base Schedule as the resource Forecast Data net of its Interchange Forecast Data and net of its Intrachange Forecast Data, as applicable.

4.2.4.4 Transmission Customers Without Resources or Load in BPA's BAA

A Transmission Customer which does not have any resources or load within PGE'sBPA's BAA shall submit a Transmission Customer Base Schedule that includes Interchange and Intrachange Forecast Data to the PGEBPA EIM Entity.

4.2.4.5 Timing of Transmission Customer Base Schedules Submission

4.2.4.5.1 Preliminary Submission of Transmission Customer Base Schedules by Transmission Customers with Resources Or Load in the BPA BAA.

Transmission Customers with resources or load in the <u>PGE-BPA</u> BAA shall submit their initial Transmission Customer Base Schedules <u>to the BPA EIM Entity</u> 7 days prior to each Operating Day ("T - 7 days"). Transmission Customers may modify the proposed Transmission Customer Base Schedule at any time but shall submit at least one update <u>to the BPA EIM Entity</u> by 10 a.m. of the day before the Operating Day.

4.2.4.5.2 Final Submissions of Transmission Customer Base Schedules

Transmission Customers shall submit proposed final Transmission Customer Base Schedules to the BPA EIM Entity, at any time but no later than 77 minutes prior to each Operating Hour ("T-77"). Transmission Customers may modify Transmission Customer Base Schedules up to and until 57 minutes prior to the Operating Hour ("T-57"). As of 55 minutes prior to each Operating Hour ("T-55"), the Transmission Customer Base Schedule data for the Operating Hour iswill be considered financially binding and Transmission Customers may not submit further changes without incurring financial settlements. If the Transmission Customer fails to enter a Forecast Data value, the default will be 0 MW for that Operating Hour.

4.2.5 Metering for Transmission Customers with Non-Participating Resources

To assess imbalance, the MO shall disaggregate meter data into 5-minute intervals if the meter intervals are not already programmed to 5-minute intervals pursuant to a Transmission Customer's applicable interconnection requirements associated with any agreement pursuant to Annexes AAttachments L and BN of this Tariff. To the extent that a Transmission Customer owns the meter or communication to the meter, the Transmission Customer shall be responsible to maintain accurate and timely data accessible for the PGEBPA EIM Entity to comply with Section 4.1.4 of this Attachment PQ.

- 5. Transmission Operations
- 5.1 Provision of Information Regarding Real-Time Status of the Transmission Provider's Transmission System

The **PGEBPA** EIM Entity shall provide the MO information on:

- (1) real time data for the Transmission System and interties; and
- (2) any changes to transmission capacity and the Transmission System due to operational circumstances.

5.2 Provision of EIM Transfer Capacity by a BPA Interchange Rights Holder

The <u>PGEBPA</u> EIM Entity shall facilitate the provision of transmission capacity for EIM Transfers offered by a <u>PGEBPA</u> Interchange Rights Holder by providing the MO with information about the amounts made available by the <u>PGEBPA</u> Interchange Rights Holder for EIM Transfers. The provision of EIM Transfer capacity shall be implemented through the <u>PGEBPA</u> Interchange Rights Holder's submission of an e-Tag by <u>75 minutes(Under review)</u> prior to the Operating Hour ("T 75"). Under review).

The PGEBPA Interchange Rights Holder shall include on the e-Tag the OASIS identification reservation number(s) associated with the transmission rights made available for EIM Transfers and shall also include the Market Operator, all transmission providers, and path operators associated with the OASIS identification reservation number(s) identified on the e-Tag. The PGEBPA Interchange Rights Holder's rights associated with the submitted e-Tag shall be available for the EIM, subject to approval of the e-Tag by all required e-Tag approval entities. The amount made available for EIM Transfers shall never exceed the PGEBPA Interchange Rights Holder's transmission rights.

5.3 Provision of EIM Transfer Capability by the PGE EIM Entity

The PGE EIM Entity shall facilitate the provision of transmission capacity for EIM Transfers by providing the MO with information about the amounts available for EIM Transfers utilizing Available Transfer Capability ("ATC"). Such amounts shall be in addition to any amounts made available by PGE Interchange Rights Holders pursuant to Section 5.2 of this Attachment P. The provision of EIM Transfer capacity corresponding to ATC shall be implemented by 40 minutes prior to the Operating Hour ("T-40") by the PGE EIM Entity. The PGE EIM Entity shall include an e-Tag, with an OASIS identification reservation number(s) created for EIM Transfers utilizing ATC, and shall also include the MO, all transmission providers, and path operators associated with the OASIS identification reservation number(s) identified in the e-Tag. The amount of ATC indicated on the e-Tag will be based upon the lower of the amount of ATC calculated by each EIM Entity at that interface by T-40. The ATC associated with the submitted e-Tag shall be available for the EIM, subject to approval of the e-Tag by all required e-Tag approval entities.

6. System Operations Under Normal and Emergency Conditions

6.1 Compliance with Reliability Standards

Participation in the EIM shall not modify, change, or otherwise alter the manner in which the Transmission Provider operates its Transmission System consistent with applicable reliability standards, including adjustments.

Participation in the EIM shall not modify, change, or otherwise alter the obligations of the PGE BPA EIM Entity, Transmission Customers with PGE BPA EIM Participating Resources, or Transmission Customers with Non-Participating Resources to comply with applicable reliability standards.

The **PGE BPA** EIM Entity shall remain responsible for:

- (1) maintaining appropriate operating reserves and for its obligations pursuant to any reserve sharing group agreements;
- (2) NERC and WECC responsibilities including, but not limited to, informing the Reliability Coordinator of issues within PGE's BPA's BAA;
- (3) processing e-Tags and managing schedule curtailments at the interties; and
- (4) monitoring and managing real-time flows within system operating limits on all transmission facilities within PGE-BPA BAA, including facilities of PGE-BPA BAA Transmission
 Owners. If requested by a Transmission Customer that is also a PGE-BPA BAA Transmission
 Owner, the PGE-BPA EIM Entity will provide additional information or data related to EIM operation as it may relate to facilities of a PGE-BPA BAA Transmission Owner.

6.2 Good Utility Practice

The <u>PGEBPA</u> EIM Entity, Transmission Customers with Non-Participating Resources, and Transmission Customers with <u>PGEBPA</u> EIM Participating Resources shall comply with Good Utility Practice with respect to this Attachment <u>PQ</u>.

6.3 Management of Contingencies and Emergencies

6.3.1 EIM Disruption

If the MO declares an EIM disruption in accordance with Section 29.7(j) of the MO Tariff, the PGEBPA EIM Entity shall, in accordance with Section 29.7(j)(4) of the MO Tariff, promptly inform the MO of actions taken in response to the EIM disruption by providing adjustment information, updates to e-Tags, transmission limit adjustments, or outage and de-rate information, as applicable.

6.3.2 Manual Dispatch

The <u>PGEBPA</u> EIM Entity may issue a Manual Dispatch order to a Transmission Customer with a <u>PGEBPA</u> EIM Participating Resource or a Non-Participating Resource in <u>PGE'sBPA's</u> BAA, to address reliability or operational issues in <u>PGE'sBPA's</u> BAA that the EIM is not able to address through normal economic dispatch and congestion management.

The **PGEBPA** EIM Entity shall inform the MO of a Manual Dispatch as soon as possible.

- 7. Outages
- 7.1. BPA EIM Entity Transmission Outages
- 7.1.1 Planned Transmission Outages and Known Derates

Under review.

7.1.2 Unplanned Transmission Outages

Under review.

7.2 BPA BAA Transmission Owner Outages

Under review.

- 7.3 BPA EIM Participating Resource Outages
- 7.3.1 Planned BPA EIM Participating Resource Outages and Known Derates

Under review.

7.3.2 Unplanned BPA EIM Participating Resource Outages

Under review.

7.3.3 Unplanned Derates

Under review.

- 7.4 Outages of Transmission Customers with Non-Participating Resources
- 7.4.1 Planned Outages and Known Derates of Transmission Customers with Non-Participating Resources

Under review.

7.4.2 Unplanned Outages of Resources of Transmission Customers with Non-Participating Resources

Under review.

7.4.3 Unplanned Derates

Under review.

8. EIM Settlements and Billing

8.1 Instructed Imbalance Energy (IIE)

Under review.

8.2 Uninstructed Imbalance Energy (UIE)

Under review.

8.3 Unaccounted for Energy (UFE)

Under review.

- 8.4 Charges for Under-Scheduling or Over-Scheduling Load
- 8.4.1 Under-Scheduling Load

Under review.

8.4.2 Over-Scheduling Load

Under review.

8.4.3 Distribution of Under-Scheduling or Over-Scheduling Proceeds

Under review.

- 8.5 EIM Uplifts
- 8.5.1 EIM BAA Real-Time Market Neutrality (Real-Time Imbalance Energy Offset BAA)

Under review.

8.5.2 EIM Entity BAA Real-Time Congestion Offset

Under review.

8.5.3 EIM Entity Real-Time Marginal Cost of Losses Offset

Under review.

8.5.4 EIM Neutrality Settlement

Under review.

8.5.5 Real-Time Bid Cost Recovery

8.5.6 Flexible Ramping Product

Under review.

8.5.7 Inaccurate or Late Actual Settlement Quality Meter Data Penalty

Under review.

8.5.8 Other EIM Settlement Provisions

Under review.

8.6 MO Tax Liabilities

Under review.

8.7 EIM Transmission Service Charges

Under review.

8.8 Variable Energy Resource Forecast Charge

Under review.

8.9 EIM Payment Calendar

Under review.

8.10 EIM Residual Balancing Account

Under review.

8.11 Market Validation and Price Correction

Under review.

8.12 Allocation of Operating Reserves

8.12.1 Payments

Under review.

8.12.2 Charges

9. Compliance

9.1 Provision of Data

Transmission Customers with <u>PGEBPA</u> EIM Participating Resources and <u>PGEBPA</u> EIM Participating Resource Scheduling Coordinators <u>are responsible for complyingmust comply</u> with information requests they receive directly from the EIM market monitor or regulatory authorities <u>with competent jurisdiction over the Transmission Customer</u> concerning EIM activities.

A Transmission Customer with <u>PGEBPA</u> EIM Participating Resources or a Transmission Customer with Non-Participating Resources must provide the <u>PGEBPA</u> EIM Entity with all data necessary to respond to information requests received by the <u>PGEBPA</u> EIM Entity from the MO, the EIM market monitor, or regulatory authorities <u>concerningthat have jurisdiction over BPA and that concern</u> EIM activities.

If the PGEBPA EIM Entity is required by applicable laws or regulations, or in the course of administrative or judicial proceedings, to disclose information that is otherwise required to be maintained in confidence, the PGEBPA EIM Entity may disclose such information; provided, however, that upon the PGEBPA EIM Entity learning of the disclosure requirement and, if possible, prior to making such disclosure, the PGEBPA EIM Entity shall notify any affected party of the requirement and the terms thereof. The affected party can, at its sole discretion and own cost, direct any challenge to or defense against will have the opportunity to object to disclosure requirement. The PGE and the information will be withheld if permitted by law.

Except for information required to be released under the Freedom of Information Act, 5 U.S.C. § 552, as amended, the BPA EIM Entity shall cooperate with the affected party to obtain proprietary or confidential treatment of confidential information by the person to whom such information is disclosed prior to any such disclosure.

The <u>PGEBPA</u> EIM Entity shall treat all Transmission Customer and Interconnection Customer data and information provided to it as market-sensitive and confidential, unless the <u>PGEBPA</u> EIM Entity is otherwise allowed or required to disclose. The <u>PGEBPA</u> EIM Entity shall continue to abide by the <u>Commission's Standards of Conduct under section 4 of the body of the Tariff</u> and handle customer information accordingly.

9.2 Rules of Conduct

These rules of conduct are intended to provide fair notice of the conduct expected and to provide an environment in which all parties may participate in the EIM on a fair and equal basis.

Transmission Customers must:

(1) Comply with Dispatch Instructions and <u>PGEBPA</u> EIM Entity operating orders in accordance with Good Utility Practice. If some limitation prevents the Transmission Customer from fulfilling the action requested by the MO or the <u>PGEBPA</u> EIM Entity, the Transmission

Customer must immediately and directly communicate the nature of any such limitation to the <u>PGEBPA</u> EIM Entity;

- (2)-Submit bids for resources that are reasonably expected to both be and remain available and capable of performing at the levels specified in the bid, based on all information that is known or should have been known at the time of submission:
- (3)-Notify the MO and/or the PGEBPA EIM Entity, as applicable, of outages in accordance with Section 7 of this Attachment PQ;
- (4)-Provide complete, accurate, and timely meter data to the <u>PGEBPA</u> EIM Entity in accordance with the metering and communication requirements of this Tariff, and maintain responsibility to ensure the accuracy of such data communicated by any customer-owned metering or communications systems. To the extent such information is not accurate or timely when provided to the <u>PGEBPA</u> EIM Entity, the Transmission Customer shall be responsible for any consequence on settlement and billing;
- (5)-Provide information to the <u>PGEBPA</u> EIM Entity, including the information requested in Sections 4.2.1, 4.2.2, 4.2.3, 4.2.4 and 9.1 of this Attachment <u>PQ</u>, by the applicable deadlines; and
- (6)-Utilize commercially-reasonable efforts to ensure that forecasts are accurate and based on all information that is known or should have been known at the time of submission to the <u>PGEBPA</u> EIM Entity.

9.3 Enforcement

The <u>PGEBPA</u> EIM Entity may refer a violation of Section 9.2 of this Attachment <u>P to to the CAISO Department of Market Monitoring or FERC. Violations of these rules of conduct may be enforced by FERC in accordance with FERC's rules and procedures. Nothing in this Section 9 is meant to limit <u>the BPA EIM Entity from pursuing</u> any other remedy <u>before FERC or any applicable judicial, governmental, or administrative body.available to it.</u></u>

- 10. Market Contingencies
- 10.1 Temporary Suspension by the MO

Under review.

10.2 Termination of Participation in EIM by the BPA EIM Entity

10.3 Corrective Actions Taken by the BPA EIM Entity for Temporary Contingencies

Under review.

10.3.1 Corrective Actions for Temporary Contingencies

Under review.

10.4 Temporary Schedules 4, 9, 11

10.4.1 Temporary Schedule 4 Energy Imbalance Service

Under review.

10.4.2 Temporary Schedule 9 Generator Imbalance Service

Under review.

10.4.3 Temporary Schedule 11 – Real Power Losses